

Proposed Redacted Version of the Declaration of Tobias Wooldridge

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE META PIXEL TAX FILING CASES

Case No. 5:22-cv-07557-PCP

**DECLARATION OF TOBIAS
 WOOLDRIDGE**

This Document Relates To:

All Actions

REDACTED VERSION OF DOCUMENT FILED UNDER SEAL

1 I, Tobias Wooldridge, declare and state as follows:

2 1. I am a software engineer at Meta Platforms, Inc. (“Meta”). I offer this declaration in
3 support of Meta’s Opposition to Plaintiffs’ Motion for Class Certification. I have personal knowledge
4 of the facts set forth herein and, if called as a witness, could and would testify competently to them.

5 **My Background and Work at Meta**

6 2. I have worked at Meta as a software engineer since February 2015. I am a senior
7 engineer on the Signals team, which bears primary responsibility for maintaining and updating the
8 Meta Pixel code. My team is also responsible for maintaining and implementing Meta’s systems that
9 detect and filter potentially sensitive data being sent by third-party developers to Meta via the Meta
10 Pixel. I have worked on the Signals team since April 2017.

11 **The Meta Pixel**

12 3. Meta’s Pixel is a free, publicly available piece of code that third-party website
13 developers can integrate into their websites and use to measure certain actions taken on their own
14 websites. Meta’s Pixel is available to and used by developers across industries. Other companies offer
15 their own pixel tools.

16 4. Specifically, when someone takes an action a developer chooses to measure on its
17 webpages (an “Event”), like adding a product to a shopping cart, the Meta Pixel code may send Meta
18 certain data—“Parameters” with specific “object properties”¹—with the Standard² and Custom³
19 Website Events they create and send via a Meta Pixel ID (“Events” and their Parameters, collectively,
20 “Event Data”). Parameters chosen by the developer could be those predefined by Meta (“Standard
21 Parameters”), or they could be those defined by the developer to fit its business needs (“Custom
22 Parameters”). Meta attempts to match the Event Data it receives to Meta user accounts. Meta cannot
23 always match Event Data to a Meta user account, and Meta does not match data with non-Meta users.

24
25 ¹ See Meta for Developers, “Meta Pixel—Reference,” <https://developers.facebook.com/docs/meta-pixel/reference>
26 (describing the “parameter objects with specific object properties, which allow you to include detailed information about
an event” that can be sent with Standard and Custom Events).

27 ² “Standard” Website Events are predefined and Meta-named Events that developers can choose to send that capture
common actions people take on a website. For example, Standard Events may capture the completion of a sign-up
28 (“Lead”), landing on a webpage (“Page Views”), or the addition of an item to a shopping cart (“Add to Cart”).

³ “Custom” Website Events are developer-defined and developer-named Events that capture user-website interactions
unique to a website.

1 5. Whether Meta can match data to a Meta user account depends on numerous factors,
2 such as the data the developer sends to Meta, including whether the developer is using Meta's
3 "advanced matching" feature, which allows developers to send hashed customer information along
4 with event data for matching purposes. Other factors that impact Meta's ability to match data to a
5 user's account include the user's browser settings, the user's account settings and cookie choices on
6 the developer's website, and the user's Meta account settings.

7 6. As for Meta's account settings, Meta enables its users to review a summary of
8 information Meta has received from third parties (including through the Pixel) that it matched to their
9 accounts, and to disconnect that data from their accounts. Specifically, using the Activity Off-Meta
10 Technologies ("OMT") (formerly the "Off-Facebook Activity") feature, Meta users can disconnect
11 historical third-party activity data from their Facebook and Instagram accounts using the "Clear
12 Previous History" option. Meta users can also "turn off" storage of future connections between their
13 Facebook and Instagram accounts and their activities off Meta's platforms using the "Disconnect
14 Future Activity" option, which will also result in the disconnection of historical third-party activity
15 data from their accounts. In addition, Meta users can "turn off" storage of future connections between
16 their Facebook and Instagram accounts and their activities off Meta's platforms on a website-by-
17 website or app-by-app basis using the "Disconnect Specific Activity" option. OMT is subject to some
18 exceptions for security and safety needs. Meta made the OMT controls broadly available to Facebook
19 users in February 2020 and to Instagram users in October 2023.

20 7. Under Meta's Business Tools Terms, Meta may retain Event Data for a maximum of
21 two years, but Meta's general practice as of the time the initial complaint was filed in this case, which
22 I understand was December 2022, was to store data received from Meta's Pixel for ads personalization
23 purposes for up to 180 days

24 **Meta Prohibits Developers from Sending Financial Information Through the Meta Pixel**

25 8. Meta does not want developers to transmit sensitive information, including financial
26 information, via the Meta Pixel. Meta has devoted significant time and effort to preventing the receipt
27 of potentially sensitive information that may be improperly sent by advertisers via the Meta Pixel.
28

1 9. **First**, as part of the Pixel creation flow, developers must agree to Meta’s Business Tools
2 Terms before they can obtain a Pixel ID and utilize Meta Pixel code on their webpages. The Business
3 Tools Terms—formerly known as the Terms For Conversion Tracking, Custom Audiences From Your
4 Website, and Custom Audiences From Your Mobile App—expressly prohibit developers from sending
5 Meta financial or otherwise sensitive information (including any information defined as sensitive under
6 applicable law) and require developers to warrant that they have the legal right to share any information
7 they choose to share with Meta. This has been true for the duration of the proposed class periods, which
8 I understand to be August 25, 2015 through June 30, 2023 and January 19, 2019 through June 30, 2023.
9 Developers must also accept Meta’s Commercial Terms—introduced in 2018—before using Meta
10 products for a business purpose, which similarly prohibit sending Meta financial or otherwise sensitive
11 information.

12 10. Attached hereto as **Exhibit 1** are true and correct copies of Meta’s Business Tools Terms
13 produced by Meta in this case as PIXEL_TAX000003681-3682 (effective February 13, 2015),
14 PIXEL_TAX000003683-3684 (effective May 26, 2016), PIXEL_TAX000003685-3686 (effective
15 June 20, 2016), PIXEL_TAX000003687-3688 (effective September 12, 2016),
16 PIXEL_TAX000003689-3690 (effective January 13, 2017), PIXEL_TAX000003760-3763 (effective
17 April 4, 2018), PIXEL_TAX000003796-3799 (effective May 25, 2018), PIXEL_TAX000003534-
18 3536 (effective April 8, 2019), PIXEL_TAX000003529-3530 (effective December 26, 2019),
19 PIXEL_TAX000003541-3542 (effective August 31, 2020), PIXEL_TAX000003543-3548 (effective
20 April 25, 2023).

21 11. Attached hereto as **Exhibit 2** are true and correct copies of Meta’s Commercial Terms
22 produced by Meta in this case as PIXEL_TAX000003626-3628 (effective May 25, 2018),
23 PIXEL_TAX000003933-3936 (effective August 31, 2020), PIXEL_TAX000003931-3932 (effective
24 September 27, 2021), and PIXEL_TAX000003979-3983 (effective January 4, 2022).

25 12. **Second**, Meta has developed, monitored, and enhanced integrity systems designed to
26 filter out incoming potentially sensitive data—including potentially sensitive financial data—they are
27 able to detect.
28

13. Specifically, in October 2018, Meta launched an integrity system [REDACTED]

[REDACTED] including certain types of potential financial data, such as

[REDACTED]. This system works by [REDACTED]

14. In November 2021, Meta launched an enhanced finance-specific integrity system that

[REDACTED] to filter out potentially sensitive

financial data that it is able to detect sent via the Meta Pixel by [REDACTED]

15. The types of potentially sensitive financial data these integrity systems are designed to

detect and filter out include but are not limited to: [REDACTED]

16. Meta makes continuous improvements to these integrity systems as part of its broader

efforts to prevent the receipt of potentially sensitive data that developers may send in violation of Meta's terms.

17. In July 2023, Meta began to launch an enhancement referred to as "core setup" that is

designed to prevent the transmission of certain types of Event Data altogether—including Custom Parameters and everything in a URL after the domain—[REDACTED].

"Core setup" applies to Event Data sent by Pixel IDs associated with domains Meta classifies as finance-related, including H&R Block and TaxAct. A developer's Pixel ID may also be enrolled automatically in "core setup" if the developer repeatedly sends data that meets Meta's potentially sensitive data detection thresholds, or if the developer opts into that configuration.

* * *

18. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: October 25, 2025

By:

Signed by:

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Tobias Wooldridge